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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES MODICO, an individual;

Plaintiff,

vs.

SOUTHERN NEVADA HEALTH DISTRICT, a
political subdivision of the State of Nevada;

Defendant.

CASE NO: 2:23-cv-02027-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT (ECF #40)
(First Request)**

COMES NOW, Plaintiff JAMES MODICO (hereinafter, "Plaintiff"), by and through his counsel, Trevor J. Hatfield, Esq., of the law firm of Hatfield & Associates, Ltd., and Defendant SOUTHERN NEVADA HEALTH DISTRICT (hereinafter "Defendant"), by and through its counsel, Stephanie Bedker, Esq., of the law firm of Freeman Mathis & Gary, LLP, do hereby stipulate and agree to extend time for Plaintiff to respond to Defendant's Motion For Summary Judgment (ECF #40), due on February 18, 2025, to March 17, 2025. This request is submitted pursuant to LR IA 6-1, 6-2 and LR 7-1 and is the parties' first request for an extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment. Defendant shall have a reciprocal extension for the filing of a Reply.

Good cause exists for this extension. Plaintiff's counsel is working with Plaintiff to prepare an opposition to Defendant's motion for summary judgment but has not been able to fully complete a response, as Plaintiff's Counsel is preparing for trial in Department XXIV from February 24, 2025,

1 to February 28, 2025, and which is likely to extend into the next week of March and even possibly
2 the second week of March.

3 Defendant has courteously agreed to this extension of time for Plaintiff to file his Response.
4 Accordingly, Plaintiff shall have up to and including March 17, 2025, to respond to Defendant's
5 Motion for Summary Judgment (ECF #40). Consistent with this extension, Defendant's reply to
6 Plaintiff's response shall be due April 14, 2025.
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8 **IT IS SO STIPULATED.**

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10 Dated: February 20, 2025

Dated: February 20, 2025

11 **HATFIELD & ASSOCIATES**

FREEMAN MATHIS & GARY, LLP

12 */s/ Trevor J. Hatfield*
By: _____
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Attorney for Plaintiff

/s/ Stephanie Bedker
By: _____
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20 **ORDER**

21 **IT IS SO ORDERED:**

22 DATED this 21st day of February, 2025.

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25 RICHARD F. BOULWARE, II
26 UNITED STATES DISTRICT JUDGE
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